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July 12, 2023

**Via ECF**Hon. Philip M. Halpern, U.S.D.J.  
The Hon. Charles L. Brieant Jr. Federal Building and Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150Re: *Wolf, et al. v. Dolgen New York LLC d/b/a Dolgen*  
Case No.: 7:23-cv-00558-PMH

Dear Judge Halpern:

As you are aware, The Dann Law Firm represents Plaintiffs Joseph Wolf, Carmen Wolf, and the putative class (collectively, the “Wolfs”) in the above referenced matter against Dolgen New York, LLC d/b/a Dolgen (“Dollar General”). In accordance with Section 2.B of Your Honor’s Individual Practices, we submit this letter to: (1) advise the court of the basis of the Wolfs’ assertion that subject-matter jurisdiction exists within this Court; and (2) provide the required limited liability company party information

The Wolfs bring this matter pursuant to the Class Action Fairness Act’s (“CAFA”) section of 28 U.S.C. 1332 which requires diversity of citizenship and an amount in controversy exceeding \$5,000,000. For purposes of diversity jurisdiction under CAFA, “an unincorporated association shall be deemed to be a citizen of the State where it has its principal place of business and the State under whose laws it is organized.” 28 U.S.C. 1332(d)(10). Dollar General maintains its principal place of business in Tennessee and is organized under the laws of Kentucky. Thus, Dollar General is a citizen of Tennessee and Kentucky for the purposes of CAFA diversity jurisdiction. Additionally, Dollar General’s sole member is Dolgencorp of Texas, Inc. Dolgencorp of Texas, Inc. maintains its principal place of business in Tennessee and is incorporated under the laws of

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Kentucky. The Wolfs are citizens of New York. Additionally, based on information and belief, including information contained in notices of removal filed in other, similar cases, the Wolfs assert that over \$5,000,000 is in controversy.

Respectfully submitted,

**The Dann Law Firm**

/s/ Javier L. Merino

Javier L. Merino, Esq.

*Counsel for Plaintiffs and the Putative Class*

Cc: All Counsel of Record (via ECF)